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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**STATE OF CALIFORNIA, by and through
Attorney General Xavier Becerra;
COUNTY OF LOS ANGELES; CITY OF
LOS ANGELES; CITY OF FREMONT;
CITY OF LONG BEACH; CITY OF
OAKLAND; CITY OF STOCKTON,**

Plaintiffs,

v.

**WILBUR L. ROSS, JR., in his official
capacity as Secretary of the U.S.
Department of Commerce; U.S.
DEPARTMENT OF COMMERCE; DR.
STEVEN DILLINGHAM, in his official
capacity as Director of the U.S. Census
Bureau; U.S. CENSUS BUREAU; DOES 1-
100,**

Defendants.

No. 3:18-cv-01865-RS

**STIPULATION TO FURTHER
ENLARGE TIME RE: ATTORNEYS'
FEES AND COSTS; [PROPOSED]
ORDER**

Dept: 3
Judge: The Honorable Richard G.
Seeborg
Trial Date: January 7, 2019
Action Filed: March 26, 2018

1 Plaintiff State of California, Plaintiff-in-Intervention Los Angeles Unified School District
2 (LAUSD and, collectively, “Plaintiffs”), and Defendants Wilbur L. Ross, Jr., U.S. Department of
3 Commerce, Dr. Steven Dillingham, and U.S. Census Bureau (collectively, “Defendants,” and
4 together with Plaintiffs, the “Parties”), by and through their respective attorneys of record,
5 stipulate as follows:

6 1. Following entrance of the initial judgment in this case, the Parties stipulated, and this
7 Court ordered, that Plaintiffs’ deadline to file any motion for attorneys’ fees or bill of costs was
8 extended until after Defendants’ appeal was resolved and a final judgment was entered. *See* ECF
9 Nos. 212, 213.

10 2. This Court entered Final Judgment After Remand, Order of Vacatur, and Permanent
11 Injunction on August 1, 2019. Pursuant to the previous stipulation and order, the deadline to file
12 a motion for attorneys’ fees was then September 3, 2019. *Id.*

13 3. Plaintiff State of California and Plaintiff-in-Intervention LAUSD filed their bills of
14 costs on August 15 and 16, 2019, respectively. ECF Nos. 241, 243. Defendants’ deadlines to file
15 objections to the bills of costs were initially August 29 and 30, 2019. *See* Local Rule 54-2.

16 4. Pursuant to prior stipulations filed by the parties on August 27, 2019 (ECF No. 244)
17 and September 11, 2019 (ECF No. 246), the Court extended Plaintiffs’ deadline to file any
18 motion for attorneys’ fees and Defendants’ deadlines to file any objections to September 27,
19 2019, to all the Parties to discuss the possibility of settlement on the issues of attorneys’ fees and
20 costs.

21 5. The Parties are committed to discussing settlement but have not yet had sufficient
22 time to reach agreement. In order to permit full and meaningful negotiations, the Parties therefore
23 jointly request a further fourteen-day extension to October 11, 2019, for: 1) the deadline to file
24 any motion for attorneys’ fees; and 2) the deadline to file objections to Plaintiffs’ filed bills of
25 costs.

26 6. This requested time modification would not have any effect on the schedule for this
27 case, other than slightly delaying any potential attorneys’ fees and costs proceedings.
28

1 **IT IS SO STIPULATED.**

2 Dated: September 26, 2019

XAVIER BECERRA
Attorney General of California
ANTHONY R. HAKL
Supervising Deputy Attorney General
GABRIELLE D. BOUTIN
Deputy Attorney General

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4
5
6 /s/ R. Matthew Wise
R. MATTHEW WISE
Deputy Attorney General
Attorneys for Plaintiff State of California, by and
through Attorney General Xavier Becerra

7
8
9 Dated: September 26, 2019

DANNIS WOLIVER KELLEY
SUE ANN SALMON EVANS
KEITH A. YEOMANS

10
11 /s/ Keith A Yeomans
Keith A. Yeomans
Attorneys for Plaintiff-Intervenor
Los Angeles Unified School District

12
13
14 Dated: September 26, 2019

JOSEPH H. HUNT
Assistant Attorney General

15
16 CARLOTTA P. WELLS
Assistant Branch Director

17 /s/ Carol Federighi
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Attorneys for Defendants

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: September 26, 2019

/s/ R. Matthew Wise
R. MATTHEW WISE

[PROPOSED] ORDER

PURSUANT TO STIPULATION,

Upon consideration thereof, and good cause appearing, it is hereby ORDERED that the deadline to file any motion for attorneys' fees and the deadlines to file any objections to Plaintiffs' filed bills of costs (ECF Nos. 241 and 243) are hereby extended to October 11, 2019.

IT IS SO ORDERED.

DATED: _____

HON. RICHARD SEEBORG
United States District Court Judge

CERTIFICATE OF SERVICE

Case Name: **State of California, et al. v.** No. **3:18-cv-01865**
Wilbur L. Ross, et al.

I hereby certify that on September 26, 2019, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

STIPULATION TO FURTHER ENLARGE TIME RE: ATTORNEYS' FEES AND COSTS; [PROPOSED] ORDER

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on September 26, 2019, at Sacramento, California.

Tracie L. Campbell
Declarant

/s/ Tracie Campbell
Signature